



October 9, 2014

CWM CHEMICAL SERVICES, LLC

1550 Balmer Road
Model City, NY 14107
716 286 1550
716 286 0211 Fax

Via E-mail

Daniel P. O'Connell
Administrative Law Judge
NYSDEC Office of Hearings and Mediation Services
625 Broadway, 1st Floor
Albany, NY 12233-1550

Re: CWM Chemical Services LLC – Part 361 and Part 373 Applications

Dear Judge O'Connell:

This is CWM's response to your October 3, 2014 letter regarding the above applications.

As requested, CWM has verified that the documents listed on the spreadsheet attached to your October 3 letter are all available electronically on the CWM website (<http://modelcity.wm.com>) and on the DEC website (<http://www.dec.ny.gov/chemical/97778.html>).

CWM has also verified that hard copies of the same list of documents are available at the following locations:

1. Youngstown Free Library, 240 Lockport Street, Youngstown, New York;
2. Porter Town Hall, 3265 Creek Road, Youngstown, New York;
3. Ransomville Free Library, 3733 Ransomville Road, Ransomville, New York; and
4. Lewiston Free Library, 305 South Eighth Street, Lewiston, New York.

In coordination with DEC Staff, CWM has verified that hard copies of the same list of documents are available at the DEC's Region 9 Office in Buffalo, New York and the Central Office in Albany, New York. CWM relied on DEC Staff to verify the hard copy documents available in the DEC Albany Office. In the Ransomville and Lewiston Libraries and the DEC Buffalo and Albany Offices, Appendices to certain reports are provided on CDs. Computers are available at those repositories. Complete hard copies are available at the Porter and Youngstown Libraries. DEC Staff concurred in the use of CDs.

In the review process, CWM identified the following discrepancy in the CWM Groundwater Sampling and Analysis Plan:

1. The list of wells in Table T6 (well inspection sheets) of the Groundwater Sampling and Analysis Plan does not include the RMU-2 monitoring wells. The

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correct Table 6 was inadvertently omitted from the November 2013 permit application documents. The RMU-2 wells are listed in other portions of the GWSAP. A copy of the correct Table 6 is attached.

CWM defers to DEC Staff regarding the content of the draft RMU-2 modification to the Sitewide Part 373 Permit.

Should you have any questions on the foregoing, please contact the undersigned at 716-286-0354 and/or Mr. Darragh.

Sincerely,



Jonathan P Rizzo, Permitting Manager
Waste Management

DMD:mlv
2021271_1.DOCX
cc: David Stever

WELL ID	IS THE WELL IN ACCEPTABLE CONDITION? (Y OR N)	COMMENTS
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BACKGROUND WELLS		
BW01S	<input type="checkbox"/> Y <input type="checkbox"/> N	
BW01D	<input type="checkbox"/> Y <input type="checkbox"/> N	
BW02D	<input type="checkbox"/> Y <input type="checkbox"/> N	
BW03S	<input type="checkbox"/> Y <input type="checkbox"/> N	
BW03D	<input type="checkbox"/> Y <input type="checkbox"/> N	
BW04S	<input type="checkbox"/> Y <input type="checkbox"/> N	
BW04D	<input type="checkbox"/> Y <input type="checkbox"/> N	
BW05S	<input type="checkbox"/> Y <input type="checkbox"/> N	
BW05D	<input type="checkbox"/> Y <input type="checkbox"/> N	

SLF 1-6 WELLS		
W101S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W101D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W102S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W201S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W201D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W202S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W202UD	<input type="checkbox"/> Y <input type="checkbox"/> N	
W202LD	<input type="checkbox"/> Y <input type="checkbox"/> N	
W301S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W301D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W302S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W303S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W401S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W401D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W402S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W501S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W501D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W502S	<input type="checkbox"/> Y <input type="checkbox"/> N	

WELL ID	IS THE WELL IN ACCEPTABLE CONDITION? (Y OR N)	COMMENTS
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SLF 1-6 WELLS

W601S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W601D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W602S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W603S	<input type="checkbox"/> Y <input type="checkbox"/> N	

SLF 7 WELLS & PIEZOMETERS

P701S	<input type="checkbox"/> Y <input type="checkbox"/> N	
P702S	<input type="checkbox"/> Y <input type="checkbox"/> N	
P703S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W701S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W701D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W702S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W702D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W703S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W703D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W704S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W704D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W705S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W705D	<input type="checkbox"/> Y <input type="checkbox"/> N	

SLF 10 WELLS & PIEZOMETERS

P1001S	<input type="checkbox"/> Y <input type="checkbox"/> N	
P1002S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1001S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1001D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1002S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1003S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1003D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1004S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1004D	<input type="checkbox"/> Y <input type="checkbox"/> N	

WELL ID	IS THE WELL IN ACCEPTABLE CONDITION? (Y OR N)	COMMENTS
SLF 11 WELLS & PIEZOMETERS		
P1102S	<input type="checkbox"/> Y <input type="checkbox"/> N	
P1103S	<input type="checkbox"/> Y <input type="checkbox"/> N	
P1104S	<input type="checkbox"/> Y <input type="checkbox"/> N	
P1105S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1101S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1101D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1102S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1102D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1103S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1103D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1104S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1104D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1105S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1105D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1106S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1106D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1107S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1107D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1108S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1108D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1109S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1109D	<input type="checkbox"/> Y <input type="checkbox"/> N	
GZR01S	<input type="checkbox"/> Y <input type="checkbox"/> N	
GZR02S	<input type="checkbox"/> Y <input type="checkbox"/> N	
GZR03S	<input type="checkbox"/> Y <input type="checkbox"/> N	
GZR04S	<input type="checkbox"/> Y <input type="checkbox"/> N	

WELL ID	IS THE WELL IN ACCEPTABLE CONDITION? (Y OR N)	COMMENTS
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SLF 12 WELLS & PIEZOMETERS

P1201S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1201S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W121UD	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
W121LD	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1202S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W122UD	<input type="checkbox"/> Y <input type="checkbox"/> N	
W122LD	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1203S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W123UD	<input type="checkbox"/> Y <input type="checkbox"/> N	
W123LD	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1204S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1204D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1205S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1205D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1206S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1206D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1207S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1207D	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1208S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W128UD	<input type="checkbox"/> Y <input type="checkbox"/> N	
W128LD	<input type="checkbox"/> Y <input type="checkbox"/> N	

FAC POND 1 & 2 WELLS

F101S	<input type="checkbox"/> Y <input type="checkbox"/> N	
F102S	<input type="checkbox"/> Y <input type="checkbox"/> N	
F102D	<input type="checkbox"/> Y <input type="checkbox"/> N	
F103S	<input type="checkbox"/> Y <input type="checkbox"/> N	

FAC POND 3 WELLS

F301S	<input type="checkbox"/> Y <input type="checkbox"/> N	
F302S	<input type="checkbox"/> Y <input type="checkbox"/> N	
F302D	<input type="checkbox"/> Y <input type="checkbox"/> N	

WELL ID	IS THE WELL IN ACCEPTABLE CONDITION? (Y OR N)	COMMENTS
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FAC POND 5 WELLS

F501S	<input type="checkbox"/> Y <input type="checkbox"/> N	
F501D	<input type="checkbox"/> Y <input type="checkbox"/> N	
F502S	<input type="checkbox"/> Y <input type="checkbox"/> N	

FAC POND 8 WELLS

F801S	<input type="checkbox"/> Y <input type="checkbox"/> N	
F802S	<input type="checkbox"/> Y <input type="checkbox"/> N	
F802LD	<input type="checkbox"/> Y <input type="checkbox"/> N	
F802UD	<input type="checkbox"/> Y <input type="checkbox"/> N	

TANK 58 WELLS

F5801S	<input type="checkbox"/> Y <input type="checkbox"/> N	
F5801D	<input type="checkbox"/> Y <input type="checkbox"/> N	
F5802S	<input type="checkbox"/> Y <input type="checkbox"/> N	

EASTWEST SALTS AREA WELLS

TW01S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW02S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW03S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW03D	<input type="checkbox"/> Y <input type="checkbox"/> N	
TP04S	<input type="checkbox"/> Y <input type="checkbox"/> N	
WS01S	<input type="checkbox"/> Y <input type="checkbox"/> N	

LAGOONS & GROUNDWATER INTERCEPTOR TRENCH WELLS

LMS01S	<input type="checkbox"/> Y <input type="checkbox"/> N	
LMS01D	<input type="checkbox"/> Y <input type="checkbox"/> N	
LMS02S	<input type="checkbox"/> Y <input type="checkbox"/> N	
LMS02D	<input type="checkbox"/> Y <input type="checkbox"/> N	
LMS03S	<input type="checkbox"/> Y <input type="checkbox"/> N	
LMS03D	<input type="checkbox"/> Y <input type="checkbox"/> N	
LMS04S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW11S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW30D		
R202S	<input type="checkbox"/> Y <input type="checkbox"/> N	

WELL ID	IS THE WELL IN ACCEPTABLE CONDITION? (Y OR N)	COMMENTS
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NORTH SALTS AREA WELLS

TW12S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW13S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW14S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW15S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW15D	<input type="checkbox"/> Y <input type="checkbox"/> N	

WEST DRUM AREA WELLS

TW16S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW17S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW19S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW20S	<input type="checkbox"/> Y <input type="checkbox"/> N	
WDA01S	<input type="checkbox"/> Y <input type="checkbox"/> N	
WDA01D	<input type="checkbox"/> Y <input type="checkbox"/> N	

MISCELLANEOUS INVESTIGATION AREA WELLS

GDA01S	<input type="checkbox"/> Y <input type="checkbox"/> N	
RR01S	<input type="checkbox"/> Y <input type="checkbox"/> N	
W1209S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW21S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW24S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW26S	<input type="checkbox"/> Y <input type="checkbox"/> N	
TW29S	<input type="checkbox"/> Y <input type="checkbox"/> N	

RMU-1 WELLS & PIEZOMETERS

R1P01S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1P02S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1P03S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1P04S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1P05S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1P07S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1P08S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1P09S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1P10S	<input type="checkbox"/> Y <input type="checkbox"/> N	

WELL ID	IS THE WELL IN ACCEPTABLE CONDITION? (Y OR N)	COMMENTS
RMU-1 WELLS & PIEZOMETERS		
R101S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R101D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R102S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R102SR	<input type="checkbox"/> Y <input type="checkbox"/> N	
R102D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R103S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R103D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R104S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R104D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R105S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R105D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R106S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R106D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R107S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R107D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R108S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1N08S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R108D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R109S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R109D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R110S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R1N10S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R110D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R111S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R111D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R112S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R113S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R114S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R114D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R115S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R116S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R116D	<input type="checkbox"/> Y <input type="checkbox"/> N	

WELL ID	IS THE WELL IN ACCEPTABLE CONDITION? (Y OR N)	COMMENTS
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RMU-1 WELLS & PIEZOMETERS (continued)
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R117UD	<input type="checkbox"/> Y <input type="checkbox"/> N	
R117LD	<input type="checkbox"/> Y <input type="checkbox"/> N	
R118S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R118D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R119D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R120D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R121D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R122D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R125D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R126D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R127D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R128D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R129D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R130D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R131D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R132D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R133D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R134D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R135D	<input type="checkbox"/> Y <input type="checkbox"/> N	

RMU-2 WELLS & PIEZOMETERS

R2P01S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R201SR	<input type="checkbox"/> Y <input type="checkbox"/> N	
R201DR	<input type="checkbox"/> Y <input type="checkbox"/> N	
R204S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R204D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R205S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R205D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R206S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R206D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R207S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R207D	<input type="checkbox"/> Y <input type="checkbox"/> N	

WELL ID	IS THE WELL IN ACCEPTABLE CONDITION? (Y OR N)	COMMENTS
RMU-2 WELLS & PIEZOMETERS (continued)		
R208S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R208D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R209S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R209D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R210S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R210D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R211S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R211D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R212S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R212LD	<input type="checkbox"/> Y <input type="checkbox"/> N	
R212UD	<input type="checkbox"/> Y <input type="checkbox"/> N	
R213S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R213D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R214S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R214D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R215S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R215D	<input type="checkbox"/> Y <input type="checkbox"/> N	
R216S	<input type="checkbox"/> Y <input type="checkbox"/> N	
R216D	<input type="checkbox"/> Y <input type="checkbox"/> N	